



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Robert L. Morgan
Executive Director

Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
(801) 538-5340 telephone
(801) 359-3940 fax
(801) 538-7223 TTY
www.nr.utah.gov

October 4, 2002

TO: Minerals File

FROM: Paul Baker, Senior Reclamation Biologist *PAB*

RE: Site Inspection, Bret Clark Mine, Hub Research and Development Company, S/015/043, Emery County, Utah

Date of Inspection: September 26, 2002
Time of Inspection: 2:00 to 3:30 p.m.
Conditions: Mostly clear, 70's
Participants: Jeff McKenzie, BLM; Paul Baker, DOGM

Purpose of Inspection:

Mr. McKenzie and I were in the area for other reasons, and we decided to follow through on problems noted in earlier inspections.

Getting to the site:

Directions to the site are given in the report for the June 7, 2002, report.

Observations:

The operator has cleaned up a lot of trash and has put a berm at the top of a road at the south end of the site (Photo 1). This berm was recommended for the purpose of keeping runoff from eroding the old road and the pad outslope below. Although I think it has been helpful, there is still runoff getting to this road from other areas, and there is still some erosion (Photo 2). I understand the site had had significant precipitation in the past few weeks. There are places where the berm is breached allowing water to flow down the outslope.

My primary concern for this site during the last inspection was that the portals were not secured. Two of the portals are still not locked. Beginning at the south end of the pad, the first portal has just a piece of fence and two timbers over the entrance (Photo 3), the same as it was during the previous inspection. The second and fourth portals had chains and locks, but the third portal was not locked (Photo 4).

Between the second and third portals, there are eight 5-gallon containers for oil, and they are partly full. There is a bench above the portal pad, and there are three 55-gallon barrels and a car

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battery on this bench. The barrels are not labeled, but they are all nearly full. I am not certain whether these are on Bret Clark's or Robert Clark's permit area.

Conclusions and Recommendations:

Regulation R647-3-112.1 requires that all mine operations be maintained in a safe, clean and environmentally stable condition. The operator needs to make some improvements to the site to fully comply with this regulation.

Although the breached berm allows water to flow down the outslope and erode this slope, the pad was not intended to be an impoundment. The report for the previous inspection recommended that the operator install one or more notched silt fences along the berm. This should be done in areas where the outslope is already eroded and self-armored.

The car battery needs to be disposed of. The barrels and other oil containers should be stored in a containment structure. Ideally, this would be a rubber lined concrete facility, but for this operation, it would be acceptable to have a lined earthen pit.

The open portals are not being maintained in a safe condition, so they are in violation of R647-3-112.1. It is conceivable that someone could have cut and stolen the chain and lock from the third portal, but it does not appear the operator has made any attempt to secure the first portal. The operator has twice been told to secure the portals and should receive a notice of noncompliance for not performing this work.

jb

cc: Bret Clark, Operator
Jeff McKenzie, BLM, State Office
Dean Nyffeler, BLM, Price FO
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ATTACHMENT

Photographs
S/015/043
Bret Clark Mine



Photo 1. Berm at the top of the old road. (The berm is difficult to see across the center of the photo.)



Photo 2. Erosion below the berm shown in Photo 1.



Photo 3. Southernmost portal.



Photo 4. Third portal from the south. There is no chain or lock.